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Remarks

Claims 1-10, 13-30, 33-40, and 60-71 are pending in the application. Claims 1-8, 10, 13-28, 30, and 33-40 were rejected. Claims 60-71 were found to be allowed. Claims 9 and 29 were objected to as being dependent on a rejected base claim, but were found to be allowable if rewritten in independent form.

Claims 1-10, 13, 30, and 33-40 were rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the enablement requirement. Specifically, the Examiner stated that "the limitation 'wherein at least one association is specific to a particular application program and at least one association is applicable to a plurality of different application programs' is not described in the specification to enable one of ordinary skill in the art as to how to make and use it." This rejection is respectfully traversed.

The Examiner's attention is directed to FIG. 4, which illustrates a Spanish language resource bundle 110 including a plurality of common associations 400, *i.e.*, common to a plurality of application programs (see page 19, line 15). For example, for a plurality of different application programs, "OK" will be associated "si". In addition, the language resource bundle 110 includes a plurality of specific associations 410, *i.e.*, specific to a particular application program (see page 19, line 22). For example, for a hospital patient inventory program, "patient name" will be associated with "paciente nombre."

Thus, as recited the above-referenced claims, at least one association ("patient name" – "paciente nombre") is specific to a particular application program and at least one association ("OK" – "si") is applicable to a plurality of different

application programs. The applicants respectfully submit that one of ordinary skill in the art would know how to create a data structure including both types of associations (application-specific and common), based on the teachings of FIG. 4 and pages 19-20. In the specification, the applicants presented a number of different types of data structures that could be used to implement a language resource bundle, e.g., array, stack, queue, object, etc. See page 19, lines 1-5. The applicants respectfully submit, therefore, that the enablement requirement has been satisfied and request that the Examiner withdraw the Section 112 rejection.

Claims 1-6, 10, 13-26, 30, and 33-40 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,490,547 to Atkin et al. ("Atkin") in view of U.S. Patent No. 6,275,978 to Bell ("Bell"). Claims 7-8 and 27-28 were rejected under 35 U.S.C. 103(a) as being unpatentable over Atkin in view of Bell and further in view of U.S. Patent No. 6,469,713 to Hetherington et al. ("Hetherington"). These rejections are respectfully traversed.

Claim 1 recites a system for providing multiple language support for at least one application program, comprising:

a plurality of language resource bundles comprising associations between language keys and displayable language-sensitive elements, each resource bundle corresponding to a different language, wherein at least one association is specific to a particular application program and at least one association is applicable to a plurality of different application programs; and

a language resource manager configured to receive a first language key from a first application program, locate a language resource bundle corresponding to a currently-selected language, identify a language-sensitive element associated with the first language key and the first application program, and provide the identified language-sensitive element to the first application program for display in a graphical user interface.

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These claimed features allow associations between language keys and language-sensitive elements (e.g., translations) to be application program-specific, i.e., different language keys may have different meanings depending on which particular application program is accessing them. As noted in the specification, a "LRB may 110 include a set of associations 410 having language keys 150 that are specific to a particular application program 170." See page 19, lines 21 and 22 (emphasis added).

For instance, the term "page" may have one meaning for a Web browser, e.g., a "Web" page, while meaning an entirely different thing to a word processor, e.g., a page of a word processing document. Accordingly, the term "page" may need to be translated differently for each application program, requiring the creation of an application program-specific association between a language key and language-sensitive element. On the other hand, certain terms may have uniform meanings across applications, such as "start," "exit," "file," etc. In such a case, an association that is not application program-specific may be created.

As the Examiner admits, Atkins does not disclose an association being specific to a particular application. Office Action, page 4. Indeed, once Atkins' text string translation engine 212 has provided a translation for a particular word, that translation is used consistently for all future occurrences of the word. Thus, Atkins actually teaches away from the concept of application program-specific associations.

However, contrary to the Examiner's assertion, the addition of Bell does not cure this deficiency of Atkins. According to the Examiner, the "second key is descriptive and provide[s] some context with respect to the specific application to be

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translated." Office Action, page 4. However, Bell's meaning of "context" is very different from an "application program," as claimed.

As clearly explained by Bell, context relates to different possible meanings of a word. According to Bell, "the string 'hot' which in English refers to situations for both temperature and taste. A localization for these two different cases in Spanish have two different meanings: The 'picante' (taste) and 'caliente' (temperature)." Col. 1, lines 58-62 (emphasis added). Thus, Bell uses the second key to indicate different possible meanings, which sometimes occur in translations between languages, not different application programs. The concept of providing different translations of a word depending on the application program is totally absent from Bell. Thus, the Examiner cannot establish a *prima facie* case of obviousness with these references.

Even if the references were combined, the combination does not result in the claimed invention. Neither reference discloses application program-specific associations between language-keys and language-sensitive elements. At best, such a combination would produce the just-in-time localization system of Atkins with Bell's provision for a second key to indicate context, *i.e.*, "picante" (taste) vs. "caliente" (temperature), within a single application program.

In view of the foregoing, the applicants respectfully submit that claim 1 is patentably distinct over the cited references, alone or in combination. Claims 21 and 40 were previously amended to include similar limitations. Claims 2-10, 13-20, 22-30, and 33-39 depend directly or indirectly on claims 1, 21, and 40. Accordingly, the applicants respectfully submit that claims 1-10, 13-30, 33-40 are patentably distinct

over the cited references, alone or in combination. Early allowance of all pending claims herein is respectfully requested.

Respectfully submitted,

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